

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

ALTAMONTE PEDIATRIC
ASSOCIATES, P.A., a Florida
Corporation,

Plaintiff,

v.

GREENWAY HEALTH, LLC, a
Delaware Limited Liability Company,

Defendant.

CIVIL ACTION

(CLASS ACTION)

Case No. 8:20-cv-00604-VMC-JSS

**PLAINTIFF'S MOTION FOR AN EXTENSION OF STAY AND TIME TO
FILE MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT
AGREEMENT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiff Altamonte Pediatric Associates, P.A. respectfully moves the Court for a three-day extension of the stay and time in which to move for preliminary approval of the settlement agreement. If the Court grants Plaintiff's request, the stay and deadline for the preliminary approval motion would be extended to July 2, 2021.

On June 8, 2021, Hon. Gregory P. Holder reported that, following mediation, the parties reached an agreement in principle to settle this matter. Dkt. 204. The parties requested the Court stay this matter for 21 days to allow the parties to execute a settlement agreement and move for preliminary class settlement approval. *Id.* The

Court thereafter entered the stay and ordered the parties to move for preliminary approval by June 29, 2021. Dkt. 205.

Plaintiff and Defendant have worked cooperatively and in good faith together and believe they are close to finalizing the settlement agreement. However, because the final settlement agreement requires approval from eight parties across three cases and several aspects of the settlement implementation and structure remain under discussion, the parties agree three additional days are needed to finalize the agreement. Accordingly, the parties request a short three-day extension of the stay and deadline to move for preliminary approval.

Local Rule 3.01(g) Certification

Plaintiff certifies that, pursuant to Local Rule 3.01(g), the parties met and conferred regarding this Motion for an Extension. Defendant supports Plaintiff's requested relief.

Dated: June 24, 2021

Respectfully submitted,

By: /s/ Jason L. Lichtman

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